

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT WINCHESTER
*Electronically Filed***

JINKS HARTSFIELD,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 4:18-CV-00069
)	
UNITED PARCEL SERVICE, INC.)	
)	
Defendant.)	

**DEFENDANT UNITED PARCEL SERVICE, INC.'S
MOTION TO COMPEL DISCOVERY RESPONSES OR, IN THE ALTERNATIVE,
DISMISS PLAINTIFF'S COMPLAINT FOR FAILURE TO PROSECUTE HIS CLAIMS**

Defendant United Parcel Service, Inc. ("UPS"), by counsel and pursuant to Fed. R. Civ. P. 37(a)(3)(B) and 41(b), moves this Court to compel Plaintiff Jinks Hartsfield to respond to its First Set of Interrogatories and Requests for Production of Documents. Alternatively, UPS requests the Court dismiss Plaintiff's Complaint in its entirety, with prejudice, for failing to prosecute his claims and for not complying with the federal rules or the Court's Scheduling Order. A supporting memorandum and proposed Order are tendered herewith.

Respectfully submitted,

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COMPLIANCE WITH FED. R. CIV. P. 37(a)(1)

As demonstrated by UPS' Memorandum in Support and corresponding Exhibits, I certify that UPS' counsel made a good faith effort to resolve the discovery dispute with Plaintiff prior to involving the Court through this Motion.

/s/ Travers B. Manley
Counsel for United Parcel Service, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via U.S. mail and e-mail on this the 17th day of September, 2019, upon the following:

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